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Mr. Robert A. McGuire Associate Director for Hazardous Materials Safety DHM-1 400 7th Street, S.W. Washington, DC 20590-0001 PHMSN-2006-24712-1

Subject: US-DOT Regulatory Adoption of ASME BPV Code Section XII "Rules for Construction and Continued Service of Transport Tanks"-2004 edition

Dear Mr. McGuire:

The Pressure Vessel Manufactures Association (PVMA) is a trade association representing pressure vessel manufacturers, related component materials suppliers and regulatory organizations. Several PVMA member companies and the Association participated in the development of the ASME Boiler and Pressure Vessel Code, Section XII, "Rules for Construction and Continued Service of Transport Tanks"-2004 edition. It provides design requirements for tanks and pressure vessel that several members manufacture.

This letter is being sent to the U.S. Department of Transportation to request that the this Code be incorporated into and made part of § 171.8 of Title 49, Code of Federal Regulations.

In 2004, the American Society of Mechanical Engineers published the first edition of the BPV Code Section XII, "Transport Tanks-2004 edition. This new section of the Boiler and Pressure Vessel Code provides requirements for construction and continued service of pressure vessels for the transportation of dangerous goods with design pressures appropriate for the transportation mode via highway, railway, air or water. Adoption of this Code in U.S. Code of Federal Register will encourage uniform design requirements and manufacturing standards for these tanks, and support the safe construction practices of this industry.

Please contact us at PVMA if you have any questions or require additional information.

August L. Sisco

Éxecutive Director, PVMA

Cc: June Ling, ASME Members PVMA